



Department of Energy

Golden Field Office
1617 Cole Boulevard
Golden, Colorado 80401-3393

June 13, 2001

DISTRIBUTION LIST

SUBJECT: REQUEST FOR PUBLIC AND AGENCY COMMENTS ON ENVIRONMENTAL ISSUES RELATED TO THE CONTINUED OPERATION AND PROPOSED SITE-WIDE IMPROVEMENTS AT NREL'S NATIONAL WIND TECHNOLOGY CENTER.

The U.S. Department of Energy (DOE) will be preparing a site-wide Environmental Assessment (EA) of continuing and proposed operations at the National Wind Technology Center (NWTC), consistent with the National Environmental Policy Act (NEPA) and DOE's NEPA implementation guidance. NEPA compliance is required because the Proposed Action involves a federal facility and the expenditure of federal dollars. DOE is the lead agency, and other federal, state, and local agencies will be invited to participate in the environmental documentation process. The EA is scheduled for completion in early 2001. The DOE requests your input on the proposed NEPA process, Proposed Action and associated environmental issues to be addressed. **For due consideration, please provide your input to the contact listed below on or before July 18, 2001.**

SITE BACKGROUND, HISTORY AND CONDITIONS

The 280-acre NWTC is located south of Highway 128 and directly east of aggregate mining and processing facilities located east of Highway 93 in Golden, Colorado (northwest Jefferson County). The Boulder/Jefferson County line is the site's northern boundary line. A regional location map is presented in Figure 1.

The primary use of the site is for wind energy research, development and testing. Wind power research activities have been ongoing at the site since the 1970's, and NWTC is the only facility of its type in the United States. There are currently 6 buildings and 5 large turbines and associated meteorological towers in addition to numerous smaller support and testing facilities located onsite. NWTC supports wind turbine design, development, testing and certification and fundamental research of turbine aerodynamic and mechanical behavior, as well as atmospheric conditions and their associated interactions. In addition the site supports NREL's research in the areas of hybrid power technologies and distributed energy resources.



PURPOSE AND NEED

A site-wide EA for NWTC was prepared in 1996. In accordance with the DOE NEPA Regulations (10 CFR section 1021.330), DOE is required to evaluate an existing site-wide EA every 5 years to determine whether it adequately addresses current agency plans, functions, programs and resource utilization. Based on new environmental conditions, applicable regulatory processes and site development proposals that were not addressed in the previous EA, DOE has determined that a new comprehensive EA should be prepared for the site.

This site-wide EA will provide an opportunity to review the collective potential effects of existing and proposed facilities and operations at NWTC. The purpose of NWTC environmental assessment activities, in conjunction with site planning activities, is to maintain and enhance the NWTC's role and capabilities as a world-class research facility focused on wind energy generation technology and other renewable energy sources.

PROPOSED ACTION AND ALTERNATIVE

The following presents a summary of the Proposed Action and Alternative that will be addressed in the EA.

Proposed Action

The Proposed Action is to continue operation of the NWTC for alternative energy research with new and improved capability. New construction projects will include permanent physical improvements to the site that involve buildings and new equipment, utilities and other infrastructure. Other activities that do not require permanent facilities or infrastructure include research programs, facility operations, management practices and maintenance activities.

The components of the Proposed Action are sorted into short-term (2002-2006) and long-term (2007-2021) estimated implementation periods. The actual schedule for implementation of the site improvements is dependent on federal budgeting decisions and fluctuating priorities, so the Proposed Action cannot be specific with respect to actual construction schedules. Those actions most likely to occur in the short term will be analyzed in detail. Because of uncertainties in future funding, the long-term wind research and distributed energy facility infrastructure improvements have not been defined in specific terms. Therefore this EA will employ a "bounding analysis" approach addressing potential implementation scenarios to provide a mechanism for analysis of future activities as they become sufficiently defined to allow for evaluation.

The Proposed Action designates the western portion of the site as a Conservation Management Area. Other measures protect Xeric Tallgrass Prairie, wetlands and other natural resources on the site. Standard construction practices include protocol and measures to limit site disruption and include site restoration requirements.

Wind turbines and other energy generating facilities on the NWTC site have and will continue to contribute power to support site needs. However, the NWTC's objective is research, not power generation. The site was selected because of unusual and high-wind characteristics that aid research. These characteristics do not support the objective of full-time wind power generation. The NWTC is not a wind farm or a dedicated renewable energy generation facility and no short-term or long-term plans exist to convert the site to serve this purpose.

Figure 2 presents a site plan that highlights the existing and proposed improvements. The following improvements define the primary components of the Proposed Action along with examples of each:

Construction of New Facilities and Research Areas

- Expansion of the Structural Blade Testing Facility to allow testing of larger blades
- Expansion to allow for a Large Dynamometer Test Facility for testing larger turbines
- Installation of three new large turbines and associated facilities
- Installation of additional test sites
- Construction of Phase I System Interconnection Test Lab to enhance distributed energy research
- Construction of test lab and field testing area for testing of advanced design technologies including: Photovoltaics, wind, fuel cells, micro-turbines, concentrated solar power, storage, combined heat and power, modular biomass, and other technologies in both generation independent and hybrid applications
- Installation of up to 10 large and 10 small solar dish/converter systems to generate 2 to 2.5 kW of power each from concentrated sunlight and to perform systems testing

Modifications and Improvements to Existing Facilities

- Renovation of the east wing of Building 251

Infrastructure Modifications and Improvements

- Improve existing road surfaces and improve building access to address fire access requirements
- Installation of new or upgraded telecommunications systems
- Installation of a new natural gas line from Highway 93 to the site for both research use and for space and water heating
- Installation of a natural gas vehicle fueling station
- Installation of electrical upgrade systems

Alternatives

At this time, the No Action Alternative is the only alternative that will be addressed in the EA. The No Action Alternative would leave the site in its current configuration, add no new facilities, and maintain current research, operation and management practices.

Other alternatives that have been considered, but eliminated from further analysis include:
New Site and Off-Site Improvements Alternative: not considered feasible because of the technical and cost implications associated with decentralized operations and site/infrastructure complications.

- Other Site Development Configuration Alternatives: not considered feasible because of the interrelated nature of the proposed facilities, site development constraints and the inherent flexibility of the Proposed Action with respect to future facility footprints.
- Reduced Development Intensity Alternative: not considered feasible because it is inconsistent with the project's purpose and need and the intent of preparing this site-wide EA.

Other alternatives raised during the scoping period will be considered and may be addressed in the EA if they are consistent with the project's purpose and need and the intent of this site-wide EA.

ENVIRONMENTAL ISSUES TO BE ADDRESSED

The proposed EA will address primary, direct, induced, secondary and cumulative impacts of the Proposed Action and alternatives. Beneficial and adverse, on-site and off-site, construction, operation, and maintenance impacts will be discussed, as appropriate. The environmental topics to be discussed in the EA include:

Land Use, Planning, Socioeconomics and Public Policy
Traffic and Circulation
Air Quality and Noise
Visual Quality/Aesthetics
Water Resources
Soils and Geology
Biological Resources
Cultural Resources
Waste Management
Public Facilities, Services and Utilities
Energy

SCHEDULE

The following key milestones and estimated dates summarize the anticipated project schedule:

Close of Scoping Period	July 18, 2001
Public Distribution of the Draft EA	October 2, 2001
Deadline for Comment on the Draft EA	November 5, 2001
Public Distribution of the Final EA	December 14, 2001
Deadline for Comments on the FINAL EA	January 14, 2002

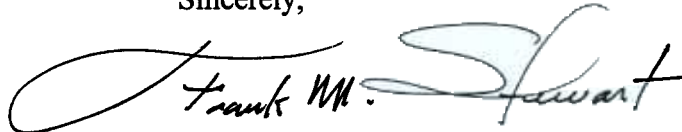
No formal public scoping meeting is currently planned for this project.

Please direct written and oral comments to:

Steven Blazek
NEPA Compliance Officer
DOE Golden Field Office
1617 Cole Boulevard
Golden, CO 80401-3393
(303) 275-4723
(303) 275- 4788 (fax)
steven_blazek@nrel.gov

We look forward to hearing from you. **For due consideration, please provide your input on or before July 18, 2001.** Thank you.

Sincerely,

A handwritten signature in black ink, reading "Frank M. Stewart". The signature is fluid and cursive, with a large initial "F" and "S".

Frank M. Stewart, Manager
U.S. Department of Energy, Golden Field Office

Attachments:

Figure 1	Regional Setting Map
Figure 2	Site Map

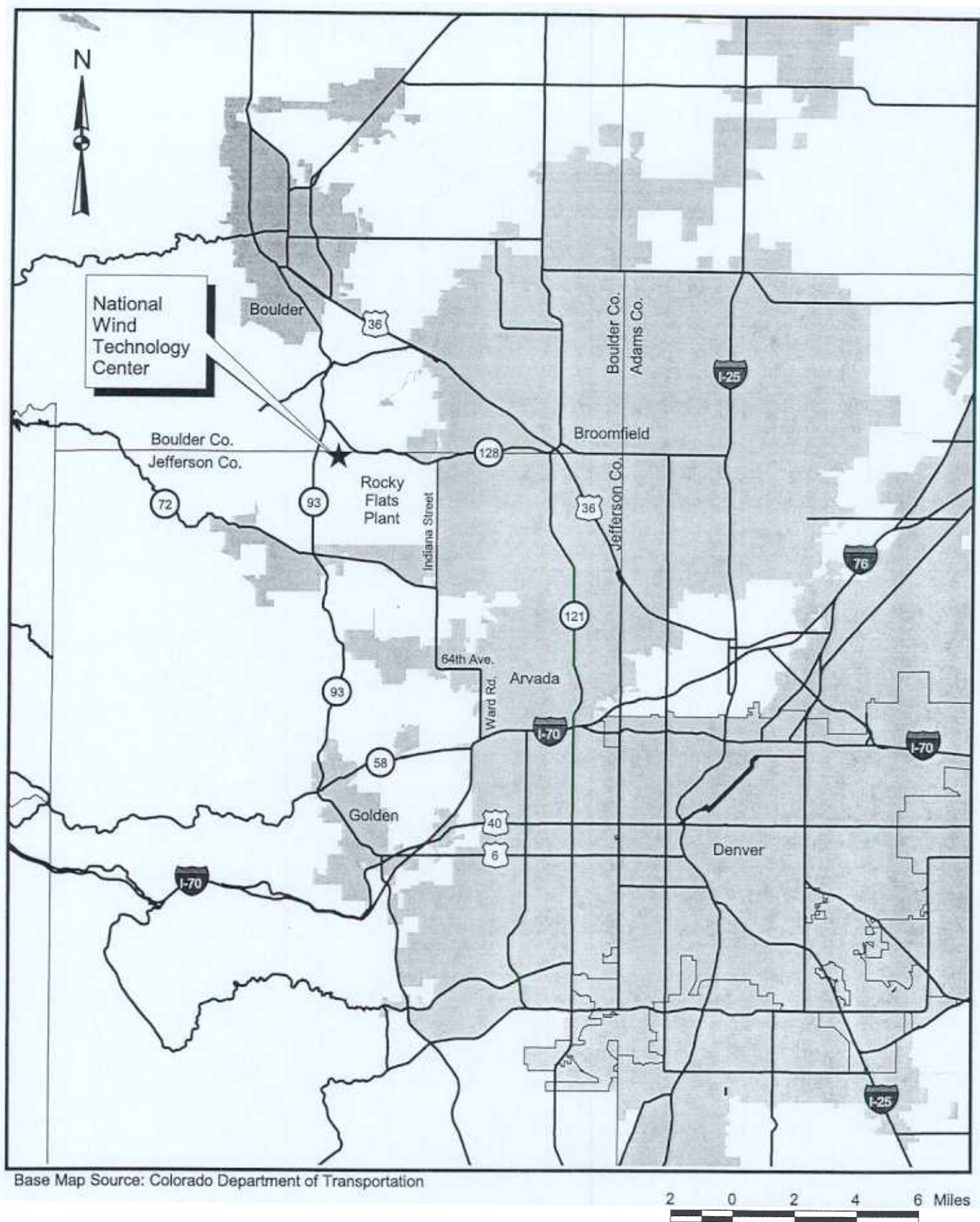


Figure 1. Regional Location Map, National Wind Technology Center

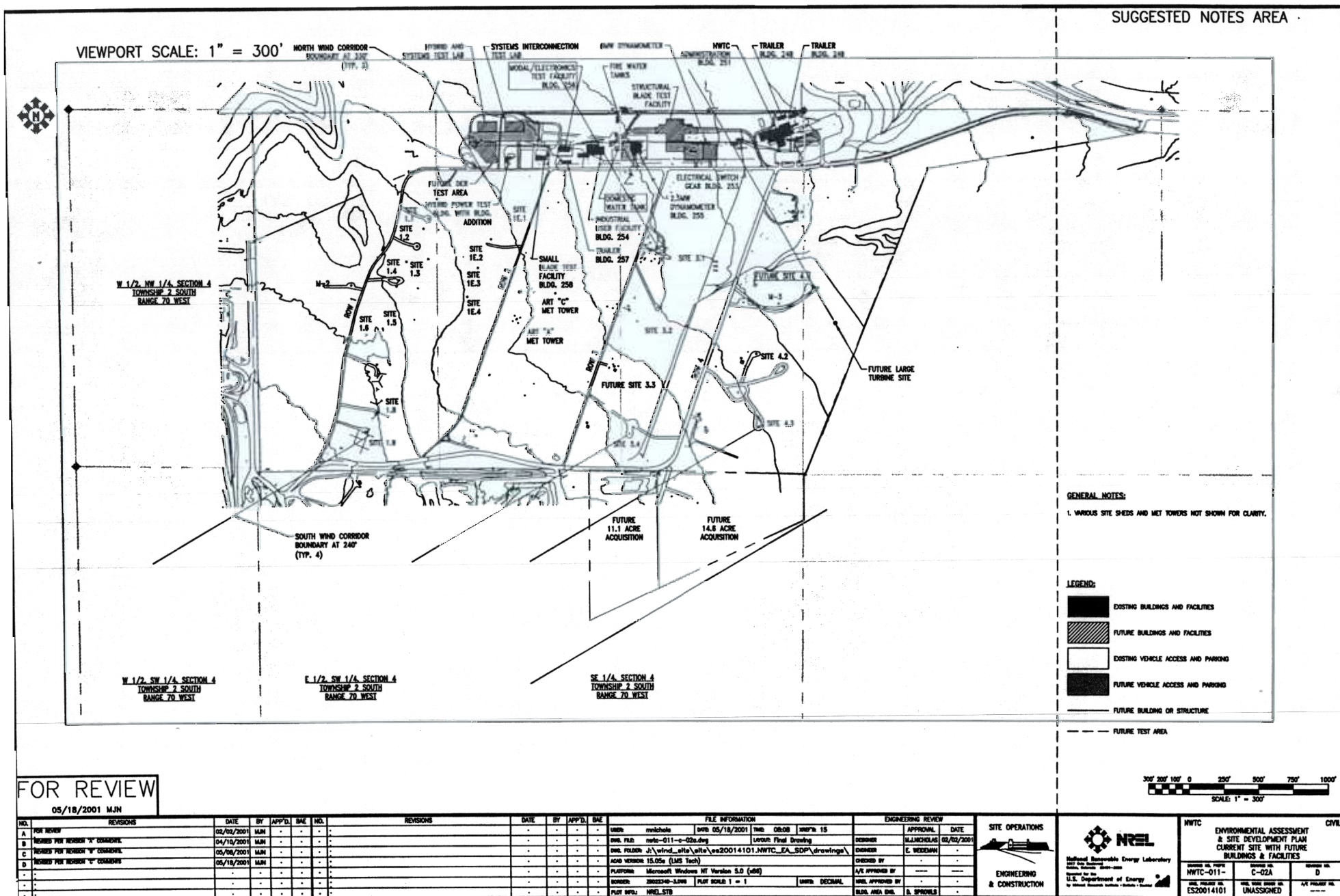


Figure 2. Site Plan, Short-Term Program of Improvements

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Ms. Judy Knight-Frank
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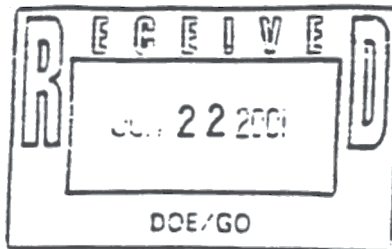
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June 20, 2001

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FAX: (303) 276-3899

RE: Comments on Continued Operation and Proposed Site-Wide Improvements at NREL's National Wind Technology Center

Dear Mr. Blazek:

The CSFS-Golden District has reviewed your scoping document for the above mentioned project at NREL's National Wind Technology Center.

Our office has no specific objections or concerns regarding this project. However, we would like to see that wildfire hazards, mitigation, and protection are covered among the environmental topics to be addressed by the Environmental Assessment for this project.

Specifically, how will the Proposed Action, and No Action Alternative, impact:

- Current and future values at risk to wildfires
- Current and future protection efforts from wildfires (suppression resources, access, etc)
- Current and future mitigation of the wildfire hazard
- Current and future vegetative fuels (grass, brush, trees, etc) on the property (extent, continuity, composition)

If you have any questions about these topics, or if our agency can be of further assistance, please do not hesitate to contact me at our Golden District office. I can be reached at 303-279-9757 x 302, or by email at alleng@lamar.colostate.edu. For additional information about wildfire hazard evaluation and mitigation, you can also contact Scott Woods, our state-wide Mitigation Coordinator. He is located at our Broomfield office (just east of the NREL National Wind Technology Center), and can be reached at 303-404-9057, or at: scorwood@lamar.colostate.edu

Sincerely,

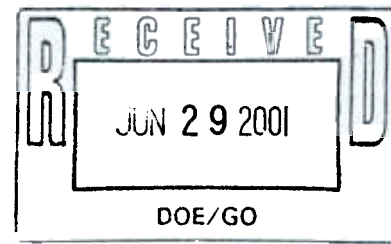
Allen Gallamore
Golden District Forester

cc Scott Woods, Wildfire Hazard Mitigation Coordinator, CSFS-Broomfield
Chris Wooley, Wildfire Mitigation Specialist, Jefferson County Emergency Management



JEFFCO AIRPORT
DENVER'S CORPORATE CHOICE

SPB
June 27, 2001
Steven Blazek
NEPA Compliance Officer
DOE Golden Field Officer
1617 Cole Boulevard
Golden CO 80401



Dear Mr. Blazek:

After reviewing the Environmental Assessment of the National Wind Technology Center, Jefferson County Airport has some concerns of potential interference with height restrictions and navigation and communication equipment that could effect the safe operations of aircraft. The Airport recommends the following:

File the appropriate FAA Form 7460-1 Notice of Proposed Construction or Alteration for both the building height and any construction cranes necessary for the project and for the concern of interference to the FAA VOR Navigational device. Obstruction lights may also be required on top of the structures.

BOARD of COUNTY COMMISSIONERS

Michelle LAWRENCE
DISTRICT No. 1

PATRICIA B. HOLLOWAY
DISTRICT No. 2

RICHARD M. SHEEHAN
DISTRICT No. 3

Enclosed is a FAA Form 7460-1 for your use.

We appreciate the opportunity to comment on the project and would like to be kept informed about the status of it. If you have any questions, please contact me at 303-466-2314.

Sincerely,

Traci Plunkett
Property Administrator
Jefferson County Airport

AIRPORT MANAGEMENT

Jeffrey C. Price
AIRPORT MANAGER

Troy W. Stover
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FAX: (303) 271-4875

<http://jeffcoairport.co.jefferson.co.us>

FAA CONTROL TOWER • ILS ON 29R
RUNWAYS: 29R-11L (9,000')
29L-11R (7,000') 02-20 (3,600')

U.S. Department of Transportation
Federal Aviation Administration

Failure To Provide All Requested Information May Delay Processing of Your Notice

Notice of Proposed Construction or Alteration**FOR FAA USE ONLY**

Aeronautical Study Number

1. Sponsor (person, company, etc. proposing this action) :Attn.of: _____
Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____**2. Sponsor's Representative (if other than #1) :**Attn.of: _____
Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Telephone: _____ Fax: _____**3. Notice of:** ☐ New Construction ☐ Alteration ☐ Existing**4. Duration:** ☐ Permanent ☐ Temporary (____ months, ____ days)**5. Work Schedule:** Beginning _____ End _____**6. Type:** ☐ Antenna Tower ☐ Crane ☐ Building ☐ Power Line
☐ Landfill ☐ Water Tank ☐ Other _____**7. Marking/Painting and/or Lighting Preferred:**☐ Red Lights and Paint ☐ Dual - Red and Medium Intensity White
☐ White - Medium Intensity ☐ Dual - Red and High Intensity White
☐ White - High Intensity ☐ Other _____**8. FCC Antenna Structure Registration Number (if applicable):** _____**9. Latitude:** _____ ° _____ ' _____ " "**10. Longitude:** _____ ° _____ ' _____ " "**11. Datum:** ☐ NAD 83 ☐ NAD 27 ☐ Other _____**12. Nearest City:** _____ **State:** _____**13. Nearest *Public-use* (not private-use) or Military Airport or Heliport:** _____**14. Distance from #13. to Structure:** _____**15. Direction from #13. to Structure:** _____**16. Site Elevation (AMSL):** _____ ft.**17. Total Structure Height (AGL):** _____ ft.**18. Overall Height (#16. + #17.) (AMSL):** _____ ft.**19. Previous FAA Aeronautical Study Number (if applicable):** _____

- OE

20. Description of Location: (Attach a USGS 7.5 minute
Quadrangle Map with the precise site marked and any certified survey.)**21. Complete Description of Proposal:**

Frequency/Power (kW)

Notice is required by 14 Code of Federal Regulations, part 77 pursuant to 49 U.S.C., Section 44718. Persons who knowingly and willingly violate the notice requirements of part 77 are subject to a civil penalty of \$1,000 per day until the notice is received, pursuant to 49 U.S.C., Section 46301 (a).

I hereby certify that all of the above statements made by me are true, complete, and correct to the best of my knowledge. In addition, I agree to mark and/or light the structure in accordance with established marking & lighting standards as necessary.

Date

Typed or Printed Name and Title of Person Filing Notice

Signature



Board of County Commissioners

Michelle Lawrence

District No. 1

Patricia B. Holloway

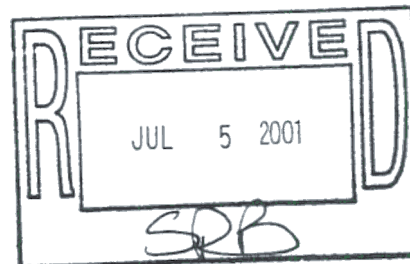
District No. 2

Richard M. Sheehan

District No. 3

July 3, 2001

Mr. Steven Blazek
NEPA Compliance Officer
DOE Golden Field Office
1617 Cole Boulevard
Golden, CO 80410-3393



Re Request for Comment – National Wind Technology Center

Dear Mr. Blazek:

In response to your request for comments, we offer the following observations:

We suggest that you consider the possibility that your site contains the Prebles Meadow Jumping Mouse habitat, or the animal itself.

We believe that your site contains tall grass prairie. We suggest that you contact the Jefferson County Naturalist Association for maps and information.

3. We recommend that you continue to provide the community service of monitoring wind speed and direction. This monitoring could assist with emergency evacuation of any nearby residents in the case of some sort of toxic spill/gas release.
4. Access to the Highway 128 appears to be “awkward” and is not at a right angle. Improvements to this intersection for safety purposes may be needed. Please fully analyze this issue, which would be compounded with the possibility of adding new employees to the site.
5. Please continue to offer public viewing areas so that the public can view the ongoing research.

Finally, as you develop detailed site plans, we suggest that you file an application for Site Approval with Jefferson County. It is a 30 day process which culminates in a hearing before the Planning Commission. With this process, we could offer you a detailed planning and engineering review of your plans.

In closing, we thank you for the opportunity to respond.

Sincerely,

Preston L. Chisom, AICP

Planning and Engineering Manager



Post Office Box 471 • Boulder, Colorado 80306

Land Use Department

Courthouse Annex
2045 13th Street • 13th & Spruce Streets • Boulder, Colorado 80302 • (303) 441-3930

TO: Brian Kennedy, SAIC
FROM: Peter Fogg – Manager, Long Range Division
DATE: July 13, 2001
RE: EA NEPA Compliance for NREL's National Wind Technology Center Improvements

Having reviewed the Issues list on page 4 of the DOE's transmittal, we do not foresee any particular concerns arising from the site plans. The Biological Resources of interest to Boulder County -- xeric tallgrass prairie, wetlands, potential Preble's Meadow Jumping Mouse (*Zapus hudsonius preblei*) habitat, potential presence of Ute's ladies tresses orchid (*Spiranthes diluvialis*), Colorado butterfly plant (*Gaura neomexicana ssp. coloradensis*) and other features are apparently to be addressed. Lands in Boulder County adjoining the site are held in City of Boulder open space. No land use developments within the City or Boulder County are being contemplated along the south county line. Visual impacts from the existing facility are minimal from county subdivisions and roads with the exception of vehicle traffic using SH 128. I am personally unaware of any complaints being lodged by Boulder County residents regarding any aspect of the facility's location and operations over the 10 years I have been the manager of the Long Range Planning Division. I am forwarding the DOE's Request for Comments to our Transportation Department for their review. For your records the contact persons in that department are either Mike Thomas or Clark Misner. The phone number is (303) 441-3900. Please call me at your convenience if you need additional information or clarification.



United States Department of the Interior



FISH AND WILDLIFE SERVICE

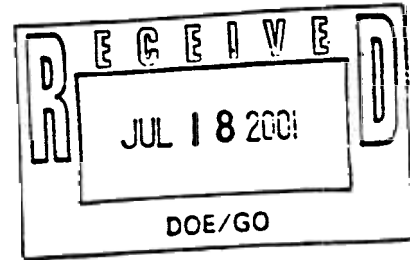
Rocky Mountain Arsenal National Wildlife Refuge

Building 111

Commerce City, Colorado 80022-1748

Telephone (303) 289-0232 Fax (303) 289-0579

July 17, 2001



Mr. Steven Blazek
NEPA Compliance Officer
DOE Golden Field Office
1617 Cole Boulevard
Golden, Colorado 80401-3393


Dear Mr. Blazek:

This letter is in response to the Department of Energy's request for public and agency comments on environmental issues related to the continued operation and proposed site-wide improvements at NREL's National Wind Technology Center (NWTC). The United States Fish and Wildlife Service, from the Rocky Mountain Arsenal National Wildlife Refuge, at the Rocky Flats Environmental Technology Site has reviewed the scoping document and has the following comments.

1. Make sure the schedule and the text match completion dates.
2. The proposed action designates the western portion of the site as a Conservation Management Area. What is the purpose of this area? What is being conserved and why? Will there be a formal Conservation Management Plan? If so, when and who will prepare the plan? Who will be responsible for implementing the management of the area?
3. The scoping document states: "Other measures protect Xeric Tallgrass Prairie, wetlands, and other natural resources on the site." What are the other measures?
4. If new turbines are installed, the U.S. Fish and Wildlife Service should be consulted on the potential for bird strikes.
5. The maps do not show where the new natural gas line from Highway 93 would enter the site. Will it be running through the Conservation Management Area?
6. The U.S. Fish and Wildlife Service understands that the NWTC was built on property that was formerly a part of what is now known as the Rocky Flats Environmental Technology Site (RFETS). Knowing that the RFETS is undergoing a Comprehensive Environmental Response, Compensation, and Liability Act cleanup. Was the property transferred to the NWTC delisted from the National Priority List?
7. As the NWTC is developed, impacts to off-site resources should be investigated and may require consultation with the U.S. Fish and Wildlife Service on endangered species issues.

The U.S. Fish and Wildlife Service appreciates this opportunity to comment on the scoping for the site-wide Environmental Assessment of continuing and proposed operations at NWTC. We look forward to working with you on the Draft Environmental Assessment. If you have questions, please contact me at (303) 966-5413.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Mark Sattelberg", written over a horizontal line.

R. Mark Sattelberg
U.S. Fish and Wildlife Service
c/o U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

**MASSEY
SEMENOFF
SCHWARZ &
BAILEY, P.C.**
ATTORNEYS AT LAW

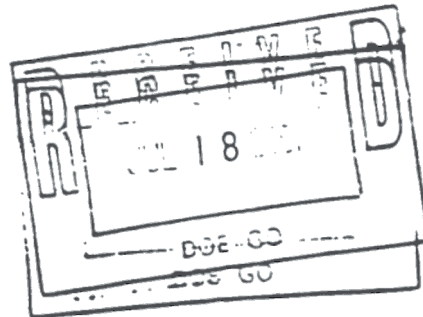
THE EQUITABLE BUILDING
730 SEVENTEENTH STREET, SUITE 330
DENVER, COLORADO 80202

TELEPHONE 303.893.1815
FAX 303.893.1829
www.mssdenverlaw.com

EDWARD W. STERN, ESQ.
IN MEMORIAM 1942-2000

DAVID A. BAILEY
303.893.1827
dbailey@mssdenverlaw.com

July 17, 2001



BY TELECOPY (303-275-4723) AND U.S. MAIL

Mr. Steven Blazek
NEPA Compliance Officer
DOE Golden Field Office
1617 Cole Boulevard
Golden, Colorado 80401-3993

Re: Comments to Site-Wide Environmental Assessment of Continuing
and Proposed Operations at the National Wind Technology Center
("NWTC")

Dear Mr. Blazek

This firm is legal counsel for Mineral Reserves, Inc. ("MRI"), which provides the following comments as part of the scoping process for the site-wide Environmental Assessment of continuing and proposed operations at the NWTC (the "EA"). As you know, MRI is the lessee of certain mineral leases which authorize it to conduct sand and gravel mining and processing operations on property located south of the NWTC property and, subject to final approval by Jefferson County, to expand those operations to certain other properties, including a portion of the site on which the NWTC is located currently. MRI, as successor to Western Aggregates, Inc., is also a party to that certain Utility Right-of-Way Grant of Easement, dated July 27, 1995 (the "Easement Agreement"), and a Memorandum of Agreement, also dated July 27, 1995 (the "MOA"). Both of the foregoing agreements are between MRI and DOE.

Scoping Comments

1. MRI requests that the EA expressly recognize and discuss the mineral leases, Easement Agreement and the MOA, including without limitation MRI's right to conduct mining operations on the leased property. MRI believes that it is important for all persons with an interest in the property currently and to be mined by MRI to publicly and consistently recognize MRI's rights to conduct mining and processing operations. Similarly, MRI's right to use the access created by the Easement Agreement should be expressly acknowledged and protected as part of any federal land planning process such as the EA. Please contact us if we

Mr. Steven Blazek
July 17, 2001
Page 2

can provide legal descriptions of, or information about, the property subject to the leases, the Easement Agreement or the MOA.

2. New construction or modification of existing facilities by DOE at the NWTC may reduce the already minimal quantity of topsoil available for reclamation activities on MRI's leased property. MRI requests that EA acknowledge this potential and require DOE and its consultants and contractors to work closely with MRI to preserve this resource to the maximum extent possible.

3. Any new land acquisition (see Figure 2) or facility improvement at the NWTC should explicitly recognize MRI's lease rights, the Easement Agreement and the MOA, and DOE should acknowledge in the EA a commitment to work with MRI to allow it to fully obtain the benefits of its legal rights. For example, construction of new structures or modification of existing ones could, in the absence of advance planning, result in removal of federal improvements or implementation of other costly means to assure MRI's right and ability to mine the property.

4. MRI notes that there appear to be some areas of overlap between the current and proposed location of the NWTC and the existing and proposed area of the Rock Creek Reserve as described in the Integrated and Natural Resources Management Plan, Environmental Assessment and Finding of No Significant Impacts for the Rock Creek Reserve, issued by DOE and the Fish and Wildlife Service in May 2001. MRI believes that the federal agencies should work closely together to avoid duplicative or inconsistent regulation of the property and that MRI's right to conduct mining operations on the property be recognized and protected by both planning processes.

5. Several grassland studies are currently on-going at the NWTC and on the property DOE apparently is planning to acquire for the NWTC, including a study by ESCO (David Buckner) and certain test plots maintained by MRI. The EA should recognize these studies and be certain that no future land use plans for the NWTC adversely impact areas included in the study.

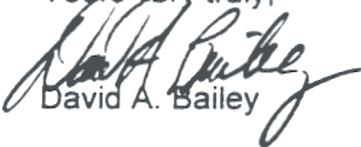
6. The EA should account for the possibility of an adverse ruling in presently pending litigation filed by the Sierra Club concerning the right-of-way granted by the Easement Agreement (such as alternate routing) to ensure that MRI receives its full contractual benefits under the Agreement.

7. The EA should describe how the current or expanded NWTC will fit into the wildlife refuges proposed by Senator Allard and Representative Udall and presently under consideration by Congress.

Mr. Steven Blazek
July 17, 2001
Page 3

MRI appreciates this opportunity to provide comments to the scoping process for the EA and looks forward to being a continuing participant in the assessment process.

Please do not hesitate to call if you have any questions or comments

Yours very truly,

David A. Bailey

DAB/zm

cc: Mr. John Hickman
Mr. Duane Bollig